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Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Commodity Futures Trading Commission,

Plaintiff,

v.

Traders Global Group Inc., a New Jersey
corporation, d/b/a “My Forex Funds”;
Traders Global Group Inc., a Canadian
business organization; and Murtuza Kazmi,

Defendants.

Case No.: 3:23-cv-11808

**STIPULATION AND JOINT
MOTION FOR A 30-DAY
EXTENSION FOR DEFENDANTS
TO FILE RESPONSIVE PLEADING
OR RULE 12 MOTION**

**STIPULATION AND JOINT MOTION FOR A 30-DAY EXTENSION FOR
DEFENDANTS TO FILE RESPONSIVE PLEADING OR RULE 12 MOTION**

Defendants Traders Global Group Inc., a New Jersey corporation, Traders Global Group Inc., a Canadian business organization, and Murtuza Kazmi (collectively, “Defendants”), by and through their counsel, and Plaintiff Commodity Futures Trading Commission (“CFTC”), by and through its counsel, hereby stipulate and jointly move the Court to extend the deadlines to file a responsive pleading or motion pursuant to Rule 12 of the Federal Rules of Civil Procedure. In support, the CFTC and Defendants stipulate as follows:

1. Defendants were served with the Summons (ECF Nos. 19, 20, 21) and Complaint (ECF No. 1) in this action on August 31, 2023.

2. Currently, the deadline for Defendants to respond to the Complaint is September 21, 2023. Fed. R. Civ. Proc. 12(a)(1)(A)(i).

3. Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), the Court has authority, “for good cause,” to extend the time if a request is made before the original time deadline expires. Fed. R. Civ. P. 6(b)(1)(A); D. N.J. Civ. R. 6.1.

4. There have been no previous requests to extend Defendants’ deadline to respond to the Complaint per Rule 12.

5. Here, good cause exists to extend the expiration of the time to file a responsive pleading or a Rule 12 motion by 30 days to allow counsel to prepare for the preliminary injunction hearing scheduled for October 11, 2023. (ECF No. 37). The requested extension would make Defendants’ new deadline to respond to the Complaint October 23, 2023, after adding time for the weekend. Fed. R. Civ. Proc. 6(a)(1)(C).

6. Plaintiff does not oppose Defendants’ request to extend the deadline for Defendants to respond to the complaint to October 23, 2023.

WHEREFORE, the parties hereby jointly move the Court to enter an order pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure and Rule 6.1 of this Court's Local Civil Rules extending Defendants' deadline to file a responsive pleading or a Rule 12 motion to October 23, 2023. If Defendants file a Rule 12 motion (even if only some claims are challenged), Defendants' deadline to file an answer shall be 14 days after notice of the Court's decision on that motion, unless all claims are dismissed. Fed. R. Civ. Proc. 12(a)(4)(A).

Pursuant to Local Civil Rule 12(c), the submitting attorney certifies that each of the signatories below has expressly agreed to the form and substance of this document and has authorized the filing attorney to submit the document electronically.

September 20, 2023

Respectfully Submitted,

/s/ Anthony J. Staltari
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September 20, 2023

Agreed and Stipulated to By:

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